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Attorneys for Plaintiffs Eduardo I.T.; Edwin E.I.I.; Ignacio P.G.; Leonel Y.P.G., a minor child;
Benjamin J.R.; and William A.J.M.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDUARDO I.T., EDWIN E.I.I., Ignacio P.G.,
Leonel Y.P.G., a minor child, Benjamin J.R., and
William A.J.M.

Plaintiffs,

vs.

UNITED STATES OF AMERICA

Defendant.

Case No. 4:22-cv-05333-DMR

**DECLARATION OF IGNACIO P.G. IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTIONS TO TRANSFER AND
DISMISS**

DEMAND FOR JURY TRIAL

1 I, Ignacio P.G., declare as follows:

2 1. I am a plaintiff in this action. I have personal knowledge of the facts stated in this
3 declaration and, if called as a witness, could and would testify competently as to those facts. I
4 understand that the Court has allowed me to litigate this case using a pseudonym. I am signing
5 this name using my pseudonym and I refer to my son by his pseudonym.

6 2. I intend to testify at the trial in this matter.

7 3. I am the father of plaintiff Leonel Y.P.G. Leonel is currently 10 years old.

8 4. Traveling to Arizona for trial would be a burden on me and my family. I currently
9 work in construction as a day laborer. I am paid by the hour and do not receive pay for time that I
10 do not work (like sick or vacation days). I have no other source of income, so if I cannot work on
11 a given day, I do not make any money on that day. I worry that taking time off from work to
12 travel to Arizona for this case would mean that I would not be able to work enough days to make
13 enough money to support myself and my family.

14 5. I do not have the financial resources necessary to litigate this case in Arizona. My
15 family's financial situation has been unstable since our arrival to the United States. We
16 consistently must make difficult decisions about how to pay for housing and basic necessities. I
17 do not have extra funds to pay for my son and myself to travel to Arizona or to pay for additional
18 lodging there.

19 6. Compared to a trial in Oakland, traveling to Arizona for trial would be much more
20 disruptive to my son Leonel. Leonel attends school in Oakland, where he is currently in the fourth
21 grade. Traveling to Arizona for trial would mean Leonel would have to miss school and risk
22 falling behind his classmates.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. This declaration was executed on December 20, 2022 at Oakland,
25 California.

26
27 /s/ Ignacio P.G.

28 IGNACIO P.G.

1 The undersigned attests that concurrence in the filing of this declaration has been obtained from
2 all signatories. Executed this 21st day of December, 2022.

3 /s/ *Dustin Chase-Woods*
4 DUSTIN CHASE-WOODS
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CERTIFICATE OF INTERPRETATION

DEMAND FOR JURY TRIAL

ENGLISH-MAM CERTIFICATE OF TRANSLATION

My name is Rosendo Aguilar and I am competent to translate from English to Mam. I read the foregoing document and following certificate of interpretation in English, and I concurrently translated the documents' contents to the declarant, Ignacio P.G., in Mam. Ignacio P.G. affirmed that he fully understood the interpretation and that the contents of the foregoing document are true and correct.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of December 2022 in Oakland, California.

/s/ Rosendo Aguilar
Rosendo Aguilar

The undersigned attests that concurrence in the filing of this certificate of interpretation has been obtained from all signatories. Executed this 21st day of December, 2022.

/s/ Dustin Chase-Woods
DUSTIN CHASE-WOODS